IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

BOBBY COLEMAN,)
Plaintiff,) Case No. 19-cv-01094
V.	
CITY OF CHICAGO, Former CHICAGO POLICE SERGEANT RONALD WATTS, Former OFFICER))) Judge Lindsay Jenkins
KALLATT MOHAMMED, OFFICER)
BRIAN BOLTON, OFFICER	
KENNETH YOUNG JR., OFFICER DARRYL EDWARDS, OFFICER)
MATTHEW CADMAN, OFFICER	
MICHAEL SPAARGAREN, OFFICER)
GEROME SUMMERS JR., OFFICER) JURY TRIAL DEMANDED
CALVIN RIDGELL, Former	
SERGEANT ALVIN JONES, and any)
Other yet-unidentified officers of the)
Chicago Police Department,	
)
D C 1)
Defendants.)

AGREED MOTION TO VACATE EXISTING SUMMARY JUDGMENT AND <u>DAUBERT DEADLINES</u>

As set forth below, Plaintiff Bobby Coleman and Defendants jointly move to vacate the existing deadlines for summary judgment motions, as well as *Daubert* motions that relate to summary judgment, to allow the parties to continue to explore the possibility of a settlement.

1. As reflected in the docket, the parties have held numerous settlement conferences with Judge Valdez in an effort to settle this case and others that were part of the *In re: Watts Coordinated Proceedings*. The most recent settlement conference was held yesterday, June 11, 2025. Another settlement conference with Judge Valdez is scheduled for June 24, 2025. The

parties have also held direct, in-person settlement discussions, and then intend to have another meeting next week. Although the discussions have not yet resulted in a settlement, the parties agree that they have made and continue to make significant progress toward reaching a settlement.

- 2. The parties also note that the *Gipson* case, which is related to this one, has settled, and that settlement received approval from the City council. *See* Dkt. 123.
- 3. In this case, the parties' motions for summary judgment, as well as *Daubert* motions for experts whose opinions are relevant for summary judgment, are currently due tomorrow, June 13, 2025. Dkt. 123.
- 4. The parties respectfully request that the Court vacate the June 13 deadline so that they may continue to concentrate their efforts on attempting to settle this case. The parties propose that they file a status report by June 27, 2025, to provide an update on settlement discussions and to propose a new summary judgment and *Daubert* scheduled if there is no settlement.
- 5. There is no trial scheduled in this matter, so vacating the current summary judgment and *Daubert* schedule will not require changes to the overall schedule in this case.

Respectfully submitted,

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